

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FITCHBURG GAS & ELECTRIC LIGHT COMPANY

D.T.E. 02-24/25

**ATTORNEY GENERAL'S FIFTH SET OF
DOCUMENT AND INFORMATION REQUESTS**

The following are the Attorney General's Fifth Set of Document and Information Requests in the above captioned proceeding.

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Fitchburg Gas & Electric Light Company or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide four copies of each response.
16. The term "Company" refers to Fitchburg Gas & Electric Light Company and its electric division. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

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DOCUMENT AND INFORMATION REQUESTS**

The following is the Attorney General's Fifth Set of Document and Information Requests in the above referenced docket.

- AG-5-1 Please provide a list of all cost of service related calculations, allocations and other computations that are incorporated in the Company's development of its proposed rates that are not in compliance with the most recent Department precedents. Provide the basis for the Company's deviation from precedent.
- AG-5-2 Please provide a complete copy of all of the Company's electric tariffs and terms and conditions that are currently in effect.
- AG-5-3 Please provide a table showing, for each rate class, the net change in the number of customers for each month during the test year.
- AG-5-4 Please provide copies of all notices to and correspondence with customers in rate classes that the Company proposes to eliminate.
- AG-5-5 Please provide a schedule listing each allocation factor used in the various accounting cost of service studies (JLH-2-1 and JLH-2-2) and identifying each account or item in the cost of service that is allocated based the factor. If different acronyms are used for the same allocator, provide a list of the acronyms that have common underlying calculations.
- AG-5-6 Please provide the cost of service studies that the Company relied on to unbundle its rates in DTE 97-110. This response must include the cost data supporting the initial external and internal transmission service charges.
- AG-5-7 Please provide copies of the most recent FERC approval of the Company's transmission rates and the Company's cost of service filings supporting the

approved rates.

- AG-5-8 Please provide a copy of the Company's most recent transmission cost of service filing made at the FERC.
- AG-5-9 Please describe, in detail, the difference between external and internal transmission. Provide a summary of the changes to each classes' internal and external transmission rates and each adjustment made to these rates since the Company initially unbundled its rates. Include all supporting workpapers, calculations and reconciliations of related revenues and costs on a class specific basis (including special contracts as a separate class).
- AG-5-10 Please provide the equivalent of Schedule JLH-2-1 accounting cost of service study using the requested rate of return.
- AG-5-11 Please provide an "external transmission" accounting cost of service study, the equivalent of Schedule JLH 2-1 at the requested rate of return. If there are any differences in the underlying calculations or use of different allocation factors employed in this study when compared to those underlying the study Schedule JLH-2-1, please identify the differences and provide the basis for each difference. If there are any differences in the underlying calculations or use of different allocation factors employed in this study when compared to those underlying the cost of service study supporting the most recently approved FERC transmission rates, please identify the differences and provide the basis for each difference.
- AG-5-12 Please provide an Electric Distribution (base rate revenue requirements--including customer accounts' revenue requirements, excluding all transmission) accounting cost of service study at the requested rate of return. This should include all schedules contained in Schedule JLH-2-1 (Electric).
- AG-5-13 Refer to Schedule JLH-2-1, page 12-1, line 5. Please provide copies of all invoices supporting the \$2,916,382 account 923 cost. Include a summary of the monthly costs by major category (general accounting, billing services, legal-DTE, legal-other, general maintenance, meter reading, customer service, etc.). If any of these costs are for personnel that perform discrete services for FG&E, identify these services and include the costs of each individual as a separate category in the summary.
- AG-5-14 Please provide copies of all Special Contracts currently in effect. Include all pricing terms and copies of the Department's approval of each agreement. For each Special Contract, provide the test year monthly revenues, segregating the revenues into volumetric, demand and customer charge revenues, and provide the actual monthly bill determinants for each revenue category.

- AG-5-15 Refer to Schedule JLH-2-1, page 9-1. Please explain what specific costs are included in account 557, Other Power Supply expenses and why these expenses are allocated to the distribution function.
- AG-5-16 Refer to Schedule JLH-2-1, page 9-1. Please explain what specific costs are included in account 565, Transmission of Electricity by Others and why these costs are allocated to the “internal” transmission function. See JLH 2-2, page 9-1.
- AG-5-17 Refer to Schedule JLH-2-1, page 9-1. Please explain what specific costs are included in account 561, Load Dispatching, and why these costs are allocated to the “internal” transmission function. See JLH-2-2, page 9-1.
- AG-5-18 Please provide a schedule showing, on an account by account basis, all test year costs related to the administration of the Company’s Standard Offer and Default service procurement and administration that the Company collects through the Standard Offer and Default rates. These costs should include, but are not limited to, LERS/Logica costs, ISO-NE charges, NEPOOL charges, personnel and administrative overhead allocations. If any category of cost is an allocation of costs, provide the basis for the allocation and identify what rate element recovers the amount not in Standard Offer or Default service rates.
- AG-5-19 Refer to Exhibit FGE-MHC-2A. Please explain, in detail, the calculations contained in this exhibit. Include an explanation of the rate class “sub-categories” and why these were used rather than the general rate classes. Explain why the company did not base this adjustment on normalized bill determinants and actual rates in effect for the relevant months.
- AG-5-20 Refer to Schedule KMA-7. Please provide the supporting documentation and calculations related to the 12.3% inflation factor.
- AG-5-21 Refer to Schedule KMA-7. Please explain how the rate design for the GD-2, GD-3, GD-4 and Streetlighting classes meet the 15% rate discount requirement of the Restructuring Act as required by the Department based on test year bill determinants
- AG-5-22 Refer to Schedule KMA-6. Please prepare a similar table addressing customer charge revenues.
- AG-5-23 What is the plant whose rental revenues are reflected in Rent for Elec Prop on p. 8-1 of JLH-2?
- AG-5-24 What is the source of the allocator PLT 364 and why is this utilized to allocate Rent for Elec Prop?

- AG-5-25 Table 2 of JLH-3 (Electric) includes the label “Using % Growth Related Net Account Additions.” Please explain what this label means.
- AG-5-26 What accounts are included in Cumulative Primary Investments? Are these dollars total investments in these accounts or have they been adjusted? If the latter, how have they been adjusted?
- AG-5-27 Why are you using the average incremental cost from 1989-2001 for “primary investments” when there appears to be an increasing trend?

Dated: July 19, 2002